



# Quilter plc Human Rights Standard (Business Operations Specific)

Parent Policy  
Responsible Business Conduct

Quilter Standard Owner  
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## 1. Introduction

This is the Human Rights Standard (the “Standard”).

This Standard supports Quilter’s approach to implementing and maintaining an adequate and effective risk management and control framework which, alongside Quilter Policies and Standards, contributes to the system of internal control set out within Quilter’s Group Governance Manual (“GGM”). This Standard should be read in conjunction with its respective Parent Policy.

### 1.1 Standard Objectives and Scope

#### *Purpose & Coverage*

The purpose of this Standard is to set out specific requirements to be applied across Quilter. Compliance is expected, however, standards do not need to be attested to as part of the Quilter Policy Framework.

The Standard is applicable across Quilter plc, including all Group Functions and Businesses as defined within the Group Governance Manual and their subsidiaries. This standard seeks to detail the key areas of potential impact we could have on human rights from the way we operate as a business and does not relate to our investment activity. Quilter recognises that as a financial services institution a significant proportion of our potential impact is via these financial assets. That is why for the investments we actively manage within Quilter we are committed to doing so in line with the UN Principles for Responsible Investment.

#### *Scope*

Governments have a duty to protect individuals against human rights abuses, but the UN Guiding Principles for Business and Human Rights also outline the corporate responsibility to respect human rights. As a signatory of the UN Global Compact, we recognise the need for us to take accountability for respecting human rights.

The content of this document has been informed by the relevant regulatory and legislative requirements including, the Human Rights Act of 1998, the Modern Slavery Act 2015 and the Equality Act 2010.

Our assessment of this issue within our business operations has identified the following key areas for consideration:

- Our workplace and the treatment of our colleagues
- Our supply chain
- Our treatment of our customers

### 1.2 Standard Owner and Review

This Standard is the responsibility of the Quilter Standard Owner. If appropriate, a member of each Business’ senior management, who has sufficient standing, can be appointed as the Standard owner for that Business (‘Business Standard Owner’). This Standard is subject to review by the Quilter Standard Owner at least annually and more frequently in the event of a significant change impacting this Standard.

## 2. Standard Requirements

The requirements set out in this Standard are minimum requirements (unless they are written in such a way that they can be applied proportionately). Where local legal or regulatory requirements are more onerous, affected Businesses must meet the local requirements in addition to meeting the Quilter requirements set out below:

Req. Ref.	Requirement
1	To ensure we continue to maintain a working environment which complies with all relevant health and safety practices.
2	To continue to treat our colleagues in line the requirements of the Equality Act 2010, creating a culture which promotes the benefits of equality and prohibits discrimination or unfair treatment on the grounds of protected characteristics.
3	As a signatory of the UN Global Compact, we will continue to uphold the rights of colleagues to freedom of association and right to collective bargaining.
4	We will also maintain a whistleblowing policy so that colleagues (or third parties working with us) can escalate concerns regarding their own treatment or issues (such as those relating to corruption) within our business.
5	As a member of the Living Wage Foundation, we will ensure that all employees and suppliers providing onsite services are paid no less than the real Living Wage as calculated by the Foundation each year.
6	To identify and reduce the risk of modern slavery in our operations and supply chain. This involves supplier due diligence and reporting our activity annually in our Modern Slavery Statement as required under the Modern Slavery Act 2015.
7	To act to ensure good customer outcomes as defined under the FCA's regulatory guidance, ensuring they are not discriminated against on the basis of protected characteristics.
8	To put in place the controls required to treat our customer and colleague data in line with the relevant data protection laws.

### 3. Governance

The Quilter Policy Framework sets out the governance requirements applicable to Quilter Standards. Businesses are responsible for co-ordinating local governance in an appropriate and proportionate manner.

The principal management forums that are relevant to this Standard include:

- Quilter Responsible Wealth Management Executive Steering Committee - The Responsible Wealth Management Steering is responsible for executive oversight, direction, and monitoring of the responsible wealth management strategy.

### 4. Reporting, Escalation and Breaches

Breaches of this Standard should be reported to the Quilter Standard Owner and Quilter Policy Specialist in accordance with the risk reporting and escalation requirements set out in Quilter's Enterprise Risk Management Policy and Risk & Event Escalation Standard. Our whistleblowing procedures can also be leveraged.

## Appendix A: Document Control

### Version Control

Note: Changes older than two years are removed for manageability of this document and stored centrally.

Version	Date	Amended By	Comment(s)
2	February 2023	Bethan Lloyd	Former standard retired (version 1) and replaced with refreshed standard.

### Approvals List

This Standard must be approved by the Quilter Policy Owner and/or Quilter Policy Delegated Owner and subject to 2<sup>nd</sup> line review. Additional governance is determined by the Quilter Standard Owner in conjunction with the Quilter Policy Owner and/or Quilter Policy Delegated Owner.

Name	Contributor/Approver	Date
Bethan Lloyd, Head of Corporate Responsibility	Approver	February 2023

The content of this standard was also subject to review from legal, HR, compliance and third-party management.

